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12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**
14

15 KATHLEEN HANNI, individually and on
behalf of all others similarly situated,

16 Plaintiff,

17 vs.

18 AMERICAN AIRLINES, INC., and DOES 1
19 through 20, inclusive,

20 Defendants.
21

CASE NO. C08-00732 CW

**DECLARATION OF JIE-MING CHOU IN
SUPPORT OF DEFENDANT AMERICAN
AIRLINES, INC.'S MOTION FOR LEAVE
TO AMEND NOTICE OF REMOVAL**

Date: April 24, 2008
Time: 2:00 p.m.
Courtroom: 2, 4th Floor

22 I, Jie-Ming Chou, hereby declare:

23 1. I am a partner with the law firm of Cooper, White & Cooper LLP located at 201
24 California Street, 17th Floor, San Francisco, California 94111 and am counsel of record for
25 American Airlines, Inc. ("American") in this action. I have personal knowledge of the matters set
26 forth in this declaration, except for those facts that are alleged on information and belief, and as to
27 those facts, I believe them to be true. I could and would testify competently thereto if called as a
28 witness.

2. On Monday, March 17, 2008, I contacted plaintiff's counsel, David Ramos, to request plaintiff's stipulation for American to file an Amended Notice of Removal in order to supplement American's original Notice of Removal with the information contained in plaintiff's settlement demand letter of March 3, 2008 with respect to plaintiff's assertion of the amount in controversy in this action. During that conversation, I provided Mr. Ramos with the relevant Ninth Circuit authority, namely *Cohn v. Petsmart, Inc.*, 281 F.3d 837 (9th Cir. 2002), on which American was basing its use of plaintiff's settlement demand.

3. Mr. Ramos responded to American's request on Tuesday, March 18, 2008 and informed me that plaintiff was unwilling to stipulate to American's filing of an Amended Notice of Removal.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on March 19, 2008 in San Francisco, California.

Jie-Ming Chou